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Attorneys for Defendant
Wright National Flood Insurance Services, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

IMAGEKEEPER LLC, a Nevada Limited
Liability Company,

Plaintiff,

v.

WRIGHT NATIONAL FLOOD INSURANCE
SERVICES, LLC, a Delaware Limited Liability
Company,

Defendant.

Civil Action No.: 2:20-cv-01470-CDS-VCF

**DECLARATION OF JORDANA A.
GARELLEK IN SUPPORT OF
DEFENDANT WRIGHT NATIONAL
FLOOD INSURANCE SERVICES, LLC'S
MOTION FOR SUMMARY JUDGMENT
FOR FAILURE TO ADEQUATELY
DISCLOSE TRADE SECRETS**

1 I, Jordana A. Garellek, declare:

2 1. I am an attorney with the law firm of Duane Morris LLP, attorneys for Defendant
3 Wright National Flood Insurance Services, LLC (“Wright Flood”). I am an attorney at law admitted
4 *pro hac vice* in this matter. I am otherwise licensed to practice law in the states of New York and
5 New Jersey. The facts set forth in this declaration are true of my own personal knowledge and, if
6 called upon to do so, I could and would competently testify thereto.

7 2. Attached as **Exhibit A** is a true and correct copy of excerpts of the September 23, 2020
8 hearing transcript on the Motion for Preliminary Injunction, ECF No. 2.

9 3. Attached as **Exhibit B** is a true and correct copy of Plaintiff ImageKeeper, LLC’s
10 Second Supplemental Response to Wright Flood’s Interrogatory No. 1 reproduced in Plaintiff
11 ImageKeeper, LLC’s Fourth Supplemental Responses and Objections to Wright Flood’s First Set of
12 Interrogatories.

13 4. Attached as **Exhibit C** is a true and correct copy of excerpts of the deposition
14 transcript of Michael Patterson dated February 22, 2022.

15 5. Attached as **Exhibit D** is a true and correct copy of Plaintiff ImageKeeper, LLC’s
16 Responses and Objections to Defendant Wright National Flood Insurance Services, LLC’s Second
17 Set of Interrogatories (9-11).

18 6. Attached as **Exhibit E** is a true and correct copy of the documents cited in Plaintiff
19 ImageKeeper, LLC’s Second Supplemental Response to Wright Flood’s Interrogatory No. 1.

20 7. Attached as **Exhibit F** is a true and correct copy of Plaintiff ImageKeeper, LLC’s First
21 Supplemental Response to Wright Flood’s Interrogatory No. 2 reproduced in Plaintiff ImageKeeper,
22 LLC’s Fourth Supplemental Responses and Objections to Wright Flood’s First Set of Interrogatories.

23
24 I declare under the laws of the United States of America that the foregoing is true and correct.

25 Executed this 27th day of April, 2022.

26
27 /s/ Jordana A. Garellek
28 Jordana A. Garellek

PROOF OF SERVICE

I hereby certify that I am a citizen of the United States and am employed in Clark County, where this mailing occurs. I am over the age of eighteen years and not a party to the within entitled action; my business address is 2475 Hanover Street, Palo Alto, CA 93404

On April 27, 2022, I served the document described as **DECLARATION OF JORDANA A. GARELLEK IN SUPPORT OF DEFENDANT WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC'S MOTION FOR SUMMARY JUDGMENT FOR FAILURE TO ADEQUATELY DISCLOSE TRADE SECRETS** on the interested party(ies) in this action:

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☐ **BY MAIL:** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Las Vegas, Nevada, in the ordinary course of business.

☐ **BY FEDERAL EXPRESS:** I served said document(s) to be delivered on the same day to a courier or driver authorized by Federal Express to receive documents, in an envelope or package designated by Federal Express.

☒ **BY ELECTRONIC SERVICE:** I served a true copy, with all exhibits, electronically on designated recipients via electronic transmission of said document(s) as provided under Federal Rules of Civil Procedure.

/s/  Andrew Hanna

An employee of DUANE MORRIS LLP